

## NASHVILLE DIVISION

*Plaintiff,*

v.

*Defendant.*

*Counter-Plaintiff,*

v.

*Counter-Defendant.*

## NOTICE OF SCRIVENERS' ERROR

Plaintiff/Counterdefendant, The Lampo Group, LLC d/b/a Ramsey Solutions (“Ramsey Solutions”), provides notice of a scriveners’ error in its *Motion for Leave to Amend Answer and Affirmatives* [Dkt. 54]. Specifically, Ramsey Solutions inadvertently referred to “illegality” as the objection referenced by Defendant Marriot Hotel Services, Inc. (“Marriott”) in its response to the Discovery, but Marriott use the term enforceability when discussing its claim that Ramsey

Solutions waived its right to contest the liquidated damages provisions. The error in reference does not in any way change the outcome or merits of the motion; that said, in re-reviewing Marriott's discovery objections, Ramsey Solutions discovered the scriveners' error and wanted to bring it to the Court's attention, nonetheless. For the reasons outlined in the motion, the error in accreditation has no bearing on the merits of the motion or Ramsey Solutions' entitlement to amend its defenses.

**Dated: August 16, 2021.**

Respectfully Submitted,

By: /s/ Jennifer G. Altman  
Jennifer Altman (FL Bar No. 881384)  
(admitted *pro hac*)  
Markenzy Lapointe (FL Bar No. 172601)  
(admitted *pro hac*)  
PILLSBURY WINTHROP SHAW PITTMAN LLP  
600 Brickell Avenue, Suite 3100  
Miami, Florida 33131  
Telephone: 786-913-4880  
[jennifer.altman@pillsburylaw.com](mailto:jennifer.altman@pillsburylaw.com)  
[markenzy.lapointe@pillsburylaw.com](mailto:markenzy.lapointe@pillsburylaw.com)

Ashley E. Cowgill (TN Bar No. 033042)  
PILLSBURY WINTHROP SHAW PITTMAN LLP  
500 Capitol Mall, Suite 1800  
Sacramento, CA 95814  
Telephone: 916-329-4721  
[ashley.cowgill@pillsburylaw.com](mailto:ashley.cowgill@pillsburylaw.com)

*Attorneys for The Lampo Group, LLC d/b/a Ramsey Solutions*

**CERTIFICATE OF SERVICE**

WE HEREBY CERTIFY that on August 16, 2021, we electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send transmissions of Notices of Electronic Filing on all Counsel of Record.

Respectfully Submitted,

By: /s/ Jennifer G. Altman  
Jennifer Altman